

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-D-11-006			Contract Period 04/29/2011 To 03/31/2014			Title of Work Assignment/SF Site Name				
			Base Option Period Number 2			Developing Permits by Rule				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW SOW: Section II. B					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 04/01/2013 To 03/31/2014					
Comments: This is the initiation of a work assignment for the Option II period. Hours have been authorized for the work plan and also for work to begin (250 hours). The contractor is to propose hours for the entire Statement of Work (attached). This work does not duplicate any work perviously performed or is currently being performed.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
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Authorized Work Assignment Ceiling										
Contract Period: Cost/Fee: LOE: 04/29/2011 To 03/31/2014										
This Action: 										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: Cost/Fee: LOE:										
Cumulative Approved: Cost/Fee: LOE:										
Work Assignment Manager Name Regina Chappell <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number 919-541-3650 FAX Number:			
Project Officer Name Karen C. Watson <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 919-541-3114 FAX Number:			
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name Rodney-Daryl Jones <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 919-541-3112 FAX Number:			

I. TITLE: Developing Permits by Rule and General Permits for Selected Source Categories in Indian Country
CONTRACTOR NAME: Eastern Research Group
CONTRACT NO.: EP-D-11-006
WORK ASSIGNMENT NUMBER: 3-05

II. WORK ASSIGNMENT MANAGER (WAM):

Regina Chappell
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
Outreach and Information Division (C304-03)
RTP, NC 27711
(919) 541-3650

III. LEVEL OF EFFORT:

Level of Effort: 250 hours (to prepare work plan and initiate work)
Duration: 12 months - ending March 31, 2014

IV. BACKGROUND:

The EPA has finalized a Federal Implementation Plan (FIP) under the Clean Air Act (CAA or Act) for Indian country. The FIP includes two New Source Review (NSR) regulations for the protection of air resources in Indian country. The first rule applies to new and modified minor stationary sources (minor sources) and to minor modifications at existing major stationary sources (major sources) throughout Indian country. The second rule (nonattainment major NSR rule) applies to new and modified major sources in areas of Indian country that are designated as not attaining the National Ambient Air Quality Standards (NAAQS). These rules will be implemented by EPA, or a delegated tribal agency assisting EPA with administration of the rules, until replaced by an EPA-approved implementation plan.

General Permits (GP) and Permits by Rule (PBR) provide a simplified application and issuance process beneficial to qualified applicants and Reviewing Authorities. GPs and PBRs contain pre-determined control criteria and emission limitations for specific source categories. Participation in the program is voluntary.

Under 40 CFR 49.156(b), EPA finalized provisions for the general permits issuance process in Indian country. These provisions include, among other requirements, that the Reviewing Authority may issue a general permit for a category of emissions units or sources that are similar in nature, have substantially similar emissions, and would be subject to the same or substantially similar requirements governing operations, emissions, monitoring, reporting, and recordkeeping. "Similar in nature" refers to size, processes, and operating conditions.

EPA will be proposing provisions for a source category PBR program for use by tribes in Indian country. A source category PBR is a preconstruction permit created by regulations for true minor sources in a specific source category to ensure compliance with the NAAQS. PBRs are designed to be more standardized and easier to implement than traditional site-specific permits and GPs because they require less information from individual sources applying for a permit.

The purpose of the work assignment (WA) is to develop GPs and PBRs in specific source categories determined by the WAM for use by tribes in Indian country. This is a follow-on to Work Assignment 2-02 under EP-D-11-006.

V. DESCRIPTION AND TASKS:

The Contractor shall provide technical support in developing a PBR program and a GP program in source categories selected by the WAM for use by tribes in Indian country in support of the Tribal NSR Rule (Review of New Sources and Modifications in Indian Country). The WAM shall identify which source categories will receive PBRs and which will receive GPs. The technical expertise provided by the Contractor may include, but is not limited to, developing eligibility criteria, general terms and conditions, and source specific terms and conditions. This expertise may include, but is not limited to, such components as minimum and maximum emissions thresholds of NSR regulated pollutants; minimum and maximum throughput thresholds; emission control requirements; and maintenance, recordkeeping, and reporting requirements. The Contractor shall also develop documents including, but not limited to:

- Technical background documents;
- Initial screening questionnaires;
- Permit applications;
- Permits for PBRs and GPs in source categories provided by the WAM; and
- Response to comments documents.

The Contractor shall provide documentation supporting the criteria selected to be used in each PBR and GP. The WAM is authorized to provide technical direction in accordance with the contract. The Contractor shall not duplicate any work previously performed. The Contractor shall perform the following tasks:

Task 1: Work Plan

The Contractor shall develop and prepare a work plan and cost estimate. The Contractor shall hold conference calls with the WAM, on an as needed basis, after approval of the work plan to plan and review progress of this WA.

Task 2: Develop General Permits for Use by Tribes in Indian Country

The Contractor shall develop GPs for specific source categories as directed by the WAM. The WAM will initiate the process by providing technical direction, examples of state programs, and prioritization of work. The Contractor shall develop program eligibility criteria for GPs in designated source categories. The Contractor shall also develop an initial screening questionnaire; permit application form, general permit, and other documents as directed by the WAM. The Contractor shall provide documentation supporting the criteria selected to be used in each GP. The Contractor shall revise the GPs and supporting documentation based on comments received the WAM and as instructed by the WAM. The Contractor shall also support the development of GPs that EPA initiates/develops.

Task 3: Develop Permits by Rule for Use by Tribes in Indian Country

The Contractor shall develop documents in support of PBRs for specific source categories as directed by the WAM (EPA will develop the actual PBR rulemaking language based on the GPs). The WAM

will initiate the process by providing technical direction, examples of state programs, and prioritization of work. The Contractor shall develop eligibility criteria for each designated source category. The Contractor shall also develop an initial screening questionnaire, PBR notification forms and other documents as directed by the WAM. The Contractor shall provide documentation supporting the criteria selected to be used in each PBR. The Contractor shall revise the supporting PBRs documents based on comments received from the WAM and as instructed by the WAM.

Task 4: Meeting Support

Upon the request of the WAM, the Contractor shall participate in conference calls with the CTPG/OID/OAQPS Tribal Team(s) to review and discuss the development of the PBR's and GP's. In addition, the Contractor shall attend meetings to be held on the EPA campus in Research Triangle Park, NC, for the same purpose, as directed by the WAM.

VI. QUALITY ASSURANCE (QA) REQUIREMENTS:

It is the policy of OAQPS that within the constraints of available resources, QA activities shall be conducted to assure environmental data generated, processed or used for its program requirements will be of known quality and will achieve prescribed data quality objectives. Furthermore, the data will be adequate and sufficient for their intended use. If the Contract/Work Assignment (project) involves one or more environmental data operations (EDO is defined as "work performed to obtain, use or report information pertaining to environmental processes and conditions,") then the Contractor shall be in compliance with the EPA Quality Manual for Environmental Programs 5360 A1, May 5 2000 and The American National Standard-Specifications and Guidelines for Environmental Data Collection and Environmental Technology Programs (ANSI/ASQC-E4-1994). The quality assurance policy of EPA requires every EDO to have a written and approved quality assurance project plan (QAPP) prior to the start of the EDO. (NOTE: OAQPS utilizes a four-tiered project category approach to its QA Program in order to focus QA. Category I involves the most stringent QA approach, whereas Category IV is the least stringent.)

This project fits within Category IV. The Contractor will document the sources of information used in determining eligibility and programmatic criteria in a QA Final Report.

VII. DELIVERABLES:

TASK	DELIVERABLE	DELIVERY SCHEDULE
1	Work Plan	20 days after effective date of WA
2	General Permits: <ul style="list-style-type: none">- Draft GPs- Revised GPs- Final QA Report	<ul style="list-style-type: none">Within 4 weeks of receiving source categories specified by WAMWithin 2 weeks of receiving revisions from WAMAt conclusion of project
3	Permits by Rule:	

	- Draft PBR Documents	Within 4 weeks of receiving source categories specified by WAM
	- Revised PBRs	Within 2 weeks of receiving revisions from WAM
	- Final QA Report	At conclusion of project
4	Meeting Support	Ongoing until March 31, 2014

VIII. REPORTING REQUIREMENTS:

The Contractor shall provide monthly progress reports in accordance with the terms of the contract. The Contractor shall submit work products in electronic as well as hard copy form. All reports shall be in accordance with contract specifications. In addition, the Contractor shall provide the WAM with draft versions of the deliverables for this WA, and shall revise those versions in response to comments from the WAM. Final versions shall be delivered in hard copy as well as in electronic format through electronic mail or on CDs or DVDs. Electronic files shall be delivered in one of the following software programs: Word (2007 or newer version) and Adobe Acrobat for documents, Excel (2007 or newer version), for spreadsheet files, and PowerPoint (2007 or newer version) for presentations.

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-D-11-006			Contract Period 04/29/2011 To 03/31/2014			Title of Work Assignment/SF Site Name				
			Base Option Period Number 2			Developing Permits by Rule				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 04/01/2013 To 03/31/2014					
Comments: This amendment changes the WAM from Regina Chappell to Mark Sendzik. There are no other changes to the work assignment. This amendment is in accordance with CMM 7.3.5.1(D).										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
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04/29/2011 To 03/31/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name Mark Sendzik							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number 919-541-5534			
							FAX Number:			
Project Officer Name Karen C. Watson							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 919-541-3114			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Rodney-Daryl Jones							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 919-541-3112			
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EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-D-11-006			Contract Period 04/29/2011 To 03/31/2015			Title of Work Assignment/SF Site Name				
			Base Option Period Number 3			Developing Permits by Rule				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 04/01/2013 To 03/31/2014					
Comments: The purpose of this work change is to increase the hours. Attached is the reasoning for this increase. The contractor shall submit a revised cost. This document is IAW the CMM 7.3.5.1(D)										
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Work Assignment Manager Name Mark Sendzik							Branch/Mail Code:			
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							FAX Number:			

Title: Developing Permits by Rule
Contractor Name: ERG
Contract #: EP-D-11-006
WA #: 3-05
Change: 2

We are requesting that additional hours be placed on the work assignment with Eastern Research Group, Inc.: “General Permits and Permits by Rule for the Indian Country Minor New Source Review Program.” The additional hours are needed to support modifications that we have made to the first permits Federal Register proposal that were not included in the original work assignment. As a result of the modifications, we anticipate the proposal will receive closer attention by a wider group of stakeholders and generate more comments than we originally anticipated. Also, if public hearings chaired by the EPA are conducted, the Contractor shall make arrangement for a court reporter and provide the WAM a transcript of the hearings. These comments will need to be summarized, responded to, and addressed in the final action.

We expect that the following issues, among others, will draw increased attention:

1. Shortened application and review process for general permits for three of the five source categories in the first proposal: gasoline dispensing facilities; petroleum dry cleaner facilities; and autobody repair and miscellaneous surface coating operations. For these three source categories, we are proposing a shorter application review process (i.e., 45 versus 90 days) and a shorter application form because these source categories are more straightforward and involve primarily one pollutant, volatile organic compounds (VOCs).
2. We are also proposing notice-and-go style permits by rule as an alternative for the same three source categories. The proposed permits by rule program would allow an individual applicant to notify the reviewing authority that it meets the eligibility criteria for the permit and the permit conditions without having to submit a completed application for review and approval.
3. We are proposing to extend the deadline for when sources in the oil and gas sector have to obtain minor source permits. We are proposing to extend the permitting deadline for true minor sources within the oil and gas source category from the September 2, 2014 deadline to a date within a range from September 2, 2015 to March 2, 2016.
4. We are proposing to allow for the creation of synthetic minor sources out of concern using general permits and permits by rule. The general permits may not be usable by hot mix asphalt plants and stone quarrying, crushing, and screening facilities unless the program covers synthetic minor sources. We have responded to this issue by proposing to allow general permits and permits by rule to create synthetic minor sources.